

BEFORE THE
STATE OF WISCONSIN
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF SECURITIES

In the Matter of,

JOSHUA STOLL,

SUMMARY ORDER TO
CEASE AND DESIST AND
PROPOSED ORDERS FOR
DISGORGEMENT AND
CIVIL PENALTIES

Respondent.

DFI Case No. S-243722 (EX)

I.

The Administrator of the State of Wisconsin, Department of Financial Institutions, Division of Securities (“Division”), having legal authority and jurisdiction to administer and enforce the Wisconsin Uniform Securities Law, Wis. Stats. Ch. 551 (“Ch. 551”) and rules and orders promulgated thereunder, and having determined that this action is necessary and appropriate in the public interest and for the protection of investors, hereby enters this Order as follows:

II.

Division staff have presented evidence sufficient for the Administrator to make the following findings of fact and conclusions of law:

A. Statement of Facts

Respondent

1. Joshua Stoll (“Stoll”) is an adult male resident of Nevada with a last known address of 4618 Saint Francis Street, North Las Vegas, Nevada 89031. At all times material, Stoll was a sales agent employed by Retire Happy, LLC and under the direction and control of Julie Minuskin.

Related Parties

2. Julie Minuskin (“Minuskin”) is an adult female resident of Nevada. Minuskin has a last known address of 7268 W. Camero Ave., Las Vegas, Nevada 89113.
3. Retire Happy, LLC was a Nevada limited liability company formed on January 18, 2012, with a last known principal place of business located at 4840 W. University Ave, A-1, Las Vegas, Nevada 89103. Retire Happy was administratively dissolved on January 21,

2021. At all material times, Minuskin was the sole managing member, chief executive officer, and registered agent of Retire Happy.

4. Dennis DiRicco (“DiRicco”) is an adult male resident of California and was a principal for several issuers sold by Retire Happy. DiRicco has a lengthy history of civil lawsuit, criminal convictions, tax liens, and regulatory orders issued against him, including but not limited to:
 - a. On or about October 18, 2013, DiRicco filed for Chapter 7 Bankruptcy in US Bankruptcy Court, Northern District of California.
 - b. On or about December 31, 2008, the State of California, Business, Transportation and Housing Agency, Department of Corporations issued a Desist and Refrain Order against DiRicco which prohibited him from conducting business as a broker-dealer and/or investment adviser in the State of California for conduct in violation of the California securities laws.
 - c. In 2000, Ricco was convicted of violating section 7212 of Title 26 of the United States Code for interference with the administration of internal revenue laws.
 - d. On or about March 17, 1989, DiRicco (California State Bar # 70646) was suspended by the California State Bar. DiRicco resigned from the California State Bar on July 7, 1989.
 - e. In 1989, DiRicco was convicted of conspiracy to defraud the United States and for aiding and abetting the preparation of false tax returns, and obstruction of justice.
5. Retire Happy, Minuskin, and Stoll have never been registered with the Division in any capacity.
6. 2528 N. California, LLC is a limited liability corporation organized in the State of Illinois on or about February 27, 2018, and involuntarily dissolved on or about August 13, 2021, with a principal place of business located at 150 N. Wacker Drive, Suite 1400, Chicago Illinois 60606.
7. Adomani, Inc., presently known as Envirotech Vehicles, Inc., (“Adomani”) is a Delaware corporation formed on November 29, 2016, with a principal place of business located at 1215 Graphite Drive, Corona, California 92881. DiRicco was the manager of Adomani at all material times.
8. Cryotherm USA, Inc. (“Cryotherm”) was a Florida corporation formed on July 19, 2012, with a last known principal place of business at 2602 NE 10th Street, Camas, Washington 98607. Cryotherm was dissolved on March 23, 2020. DiRicco was the registered agent, founder, CEO, and tax consultant and for Cryotherm at all material times.

9. Dream Team 1416, LLC (“Dream Team 1416”) was a Florida limited liability company formed on October 10, 2017, with a last known principal place of business located at 24 Cathedral Place, Suite 200, Saint Augustine, Florida 32084. Dream Team 1416 was dissolved on September 25, 2020.
10. Glen Oaks Resort, LLC (“Glen Oaks Resort”) is a Florida limited liability company formed on August 2, 2017, with a principal place of business located at 5711 Richard Street, Suite One, Jacksonville, Florida 32216.
11. Golden Genesis, Inc. (“Golden Genesis”) is a Nevada corporation formed on March 31, 2016, with a last known principal place of business located at 137 N. Guadalupe Street, San Marcos, Texas 78666. Golden Genesis previously operated under the name NuPlasma and currently does business as SpecPlasma. Di Ricco initially served as Golden Genesis's corporate secretary and a member of Golden Genesis's board and was at all material times, either directly or indirectly through his spouse, a shareholder of Golden Genesis. Although he formally resigned as Golden Genesis's chief financial officer ("CFO") and treasurer in April 2016, Di Ricco essentially continued in both roles by controlling Golden Genesis's financial activities, including, but not limited to, controlling activities in Golden Genesis's bank accounts, for which Di Ricco was a signatory until June 26, 2018.
12. Monarch Capital Investment Fund, LLC (“Monarch Capital”) is a California limited liability company formed on January 20, 2014, with a last known principal place of business located at 620 Newport Center Drive, Suite 1100, Newport Beach, California 92660.
13. Until Tomorrow Drivetrains, LLC (“Until Tomorrow Drivetrains”) is a California limited liability company formed on November 28, 2016, with a last known principal place of business at 3705 Haven Ave, Suite 108, Menlo Park, California 94025. DiRicco and Minuskin were the managers of Until Tomorrow Drivetrains at all material times.
14. Skinvisble, Inc. is a Nevada corporation formed on March 5, 1998, with a last known principal place of business at 4955 S Durango Drive Ste 165, Las Vegas, Nevada 89113.
15. Water Street Partners, LLC (“Water Street Partners”) is a Nevada limited liability company formed on November 6, 2017, with a principal place of business located at 46 S. Water Street, Henderson, Nevada 89015.
16. Zeal Wine Imports, Inc. (“Zeal”) is a California corporation formed on February 27, 2004, with a last known principal place of business at 1475 N Broadway #400, Walnut Creek CA 94596. Zeal's status is currently suspended.

17. Each party identified in ¶¶ 6-16 will be referenced herein as “Issuer” or collectively as “Issuers.”

Conduct

18. On or about August 31, 2012, Stoll filed for Chapter 7 bankruptcy in the US Court District of Nevada. Stoll’s bankruptcy was discharged December 4, 2012.
19. Upon information and belief, Retire Happy and Minuskin¹ entered into consulting agreements with the Issuers described in ¶¶ 6-16. Per these agreements, the Issuers agreed to compensate Retire Happy between 9 to 12 percent of the face value of each investment directed to the Issuer by Retire Happy. The Consulting Agreements provided the total amount of funding Retire Happy intended to raise for the Issuer, which commonly ranged between \$2,000,000 and \$6,000,000, depending on the Issuer.
20. Further, the Consulting Agreements provided that “[t]he investors which [Retire Happy] will introduce to [the Issuer] will be named and listed by signed copies of the Promissory note provided by the [Issuer].”
21. Retire Happy represented itself to potential investors as a financial advisory service for retirement accounts and promoted alternative investment opportunities. Retire Happy advised and directed investors to invest and place monies in various alternative investment issuers described in ¶¶ 6-16. In exchange for such services, Retire Happy received compensation from the issuers for referring investors.
22. Retire Happy’s website provided information on self-directed IRAs (“SDIRAs”) and offered Retire Happy’s services to help individuals with opening SDIRAs so that the investors could place their retirement funds into alternative investments.
23. Retire Happy sales agents, including Minuskin and Stoll, promoted investment opportunities in alternative investments to investors, mainly in the form of promissory notes of the Issuers. Retire Happy sales agents often represented to investors that these investment opportunities were safe, short-term investments that would provide a guaranteed return and were safer than investing in the stock market.
24. Retire Happy maintained prepared promissory notes for each Issuer that were pre-signed by the Issuers. Once an investor was interested in pursuing an investment opportunity, Retire Happy sales agents would fill in the investor’s name, amount of investment, Provident account title and number, and date before sending the promissory note to the investor for signature.

¹ Minuskin signed the agreement on behalf of Glen Oaks through her company Minuskin & Co., Inc. Minuskin & Co, Inc. was incorporated in Nevada on or about July 5, 2016, and administratively dissolved on or about July 31, 2019. Minuskin was the President, Secretary, Treasurer, and Director of Minuskin & Co.

25. Between 2013 and 2019, Retire Happy, Minuskin, and Stoll sold approximately \$932,350 in promissory notes issued by the above-described Issuers to at least ten (10) people in Wisconsin, described in the attached Exhibit 1 including:
- a. \$60,000.00 in promissory notes issued by Adomani, Inc. to one Wisconsin investor;
 - b. \$159,000.00 in promissory notes issued by Cryotherm to two Wisconsin investors;
 - c. \$25,000 in promissory notes issued by Golden Genesis to one Wisconsin investor; and
 - d. \$58,500.00 in promissory notes issued by Until Tomorrow DriveTrains to two Wisconsin investors.
26. Most of the Wisconsin investors were not accredited investors.
27. Stoll represented to many of the Wisconsin investors that the promissory notes they invested in were guaranteed against loss and safer than the stock market.
28. In fact, the promissory notes sold to investors were highly speculative and carried a high risk of loss for the investors.
29. Neither Minuskin, Stoll, nor anyone else at Retire Happy disclosed to the Wisconsin Investors the compensation Retire Happy would receive from the Wisconsin Investors' purchases of the respective Issuer's promissory notes.
30. Neither Minuskin, Stoll, nor anyone else at Retire Happy disclosed to the Wisconsin Investors that Retire Happy, Minuskin, and Stoll were not registered to offer or sell securities in Wisconsin.
31. Neither Minuskin, Stoll, nor anyone else at Retire Happy disclosed Stoll's 2012 bankruptcy to the Wisconsin investors at any time prior to or after their investments.
32. Neither Minuskin, Stoll, nor anyone else at Retire Happy disclosed any of DiRicco's history of civil, criminal, and regulatory actions described in ¶ 4.
33. Minuskin and Retire Happy knew or should have known about DiRicco history of civil, criminal, and regulatory actions described in ¶ 4.

B. Conclusions of Law

Legal Authority and Jurisdiction

34. The Administrator has legal authority and jurisdiction over the conduct described above, pursuant to Wis. Stats. Ch. 551 and the rules and orders promulgated thereunder.

35. Pursuant to Wis. Stat. § 551.102(28), a note is included in the definition of a security.
36. Pursuant to Wis. Stat. § 551.102(28)(d)(1), an investment contract includes an investment in a common enterprise with the expectation of profits to be derived through the essential managerial efforts of someone other than the investor. An investment contract is included in the definition of a security.
37. The promissory notes issued by the Issuers described in ¶¶ 7-17 and sold by Retire Happy are securities pursuant to Wis. Stats. §§ 551.102(28) and 551.102(28)(d)(1).
38. Pursuant to Wis. Stat. § 551.301(1), it is unlawful to offer or sell securities in Wisconsin unless the securities are registered under Ch. 551, exempted from registration under Ch. 551, or federally covered securities.
39. Pursuant to Wis. Stat. § 551.102(4), a broker-deal includes a person engaged in the business of effecting transactions in securities for the account of others or for the person's own account.
40. Retire Happy transacted business as a broker-dealer in Wisconsin.
41. Pursuant to Wis. Stat. § 551.102(2), "agent" means an individual, other than a broker-dealer, who represents a broker-dealer in effecting or attempting to effect purchases or sales of securities or represents an issuer in effecting or attempting to effect purchases or sales of the issuer's securities.
42. Stoll acted as an agent on behalf of Retire Happy and the issuers described in ¶¶ 6-16.
43. Pursuant to Wis. Stat. § 551.401(1), it is unlawful for a person to transact business in Wisconsin as a broker-dealer unless the person is registered under Ch. 551 as a broker-dealer or is exempt from registration as a broker-dealer under Wis. Stats. §§ 551.401(2), (4) or 551.205(1)(b)2.
44. Pursuant to Wis. Stat. § 551.402(1) it is unlawful for an individual to transact business in Wisconsin as an agent unless the individual is registered under Ch. 551 as an agent or is exempt from registration as an agent under Wis. Stat. § 551.402(2).
45. Pursuant to Wis. Stat. § 551.402(4), it is unlawful for a broker-dealer, or an issuer engaged in offering, selling, or purchasing securities in Wisconsin, to employ or associate with an agent who transacts business in Wisconsin on behalf of broker-dealers or issuers unless the agent is registered under Wis. Stat. § 551.402(1) for the broker-dealer or issuer or exempt from registration under Wis. Stat. § 551.402(2).

46. Pursuant to Wis. Stat. § 551.501(2) it is unlawful for a person, in connection with the offer, sale, or purchase of a security, directly or indirectly, to make an untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

Violations

47. As described above in ¶¶ 1-33, STOLL violated Wis. Stat. § 551.301(1) when he and Retire Happy offered securities in Wisconsin which were not registered or exempt from registration under Ch. 551 or federally covered securities.
48. As described above in ¶¶ 1-33, STOLL violated Wis. Stat. § 551.402(1) when he transacted business as an agent without being registered or exempt from registration under Ch. 551.
49. As described above in ¶¶ 1-33, STOLL violated Wis. Stat. § 551.501(2) when in connection with the offer and sale of securities to individuals in Wisconsin, he represented that the promissory notes being sold were guaranteed against loss and that there was no risk of the investors losing money.
50. As described above in ¶¶ 1-33, STOLL violated Wis. Stat. § 551.501(2) when in connection with the offer and sale of securities to individuals in Wisconsin he failed to disclose that he was not registered in any capacity to offer or sell securities.
51. As described above in ¶¶ 1-33, STOLL violated Wis. Stat. § 551.501(2) when in connection with the offer and sale of securities to individuals in Wisconsin he failed to disclose the civil, criminal, and regulatory history of DiRicco, his own 2012 bankruptcy, and how he would be compensated for the offer and sale of securities.

III.

In view of the above findings of fact and conclusions of law, the Administrator deems it necessary and appropriate in the public interest and for the protection of investors, and pursuant to its legal authority and jurisdiction under Ch. 551, to wit Wis. Stat. § 551.604, to issue the following orders and notices:

A. Summary Orders issued pursuant to Wis. Stat. § 551.604(2):

- (a) IT IS ORDERED summarily that JOSHUA STOLL, his agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of JOSHUA STOLL, shall cease and desist from making or causing to be made to any person or entity in Wisconsin any further offers or sales of securities unless and until such securities qualify as covered securities or are registered under Ch. 551 or successor statute, pursuant to Wis. Stat. §§ 551.604(1)(a) and (2).

- (b) IT IS FURTHER ORDERED summarily that all exemptions from registration set forth at Ch. 551 or successor statute that might otherwise apply to any offer or sale of any security by JOSHUA STOLL, his agents, servants, officers, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of JOSHUA STOLL, are hereby revoked, pursuant to Wis. Stat. §§ 551.604(1)(b) and (2).
- (c) IT IS FURTHER ORDERED summarily that all exemptions from registration set forth in Wis. Stat. §§ 551.201 and 551.202 that may otherwise apply to a specific security, transaction or offer of or by JOSHUA STOLL, his agents, servants, officers, employees, successors, affiliates, and every entity and person directly or indirectly controlled or organized by or on behalf of JOSHUA STOLL, are hereby revoked, pursuant to Wis. Stats. §§ 551.604(1)(c) and (2).
- (d) IT IS FURTHER ORDERED summarily that JOSHUA STOLL, his successors, affiliates, controlling persons, officers, agents, servants, employees and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of JOSHUA STOLL, are prohibited from violating Wis. Stat. § 551.501 or successor statute.
- (e) IT IS FURTHER ORDERED summarily that JOSHUA STOLL, his successors, affiliates, controlling persons, officers, agents, servants, employees, and every entity and person directly or indirectly controlled or hereafter organized by or on behalf of JOSHUA STOLL, are prohibited from violating Ch. 551 or successor statute that might otherwise apply to any offer or sale of a security of or by JOSHUA STOLL.
- (f) PLEASE TAKE NOTICE that the orders of the Administrator are effective as of the issuance of this Order, pursuant to Wis. Stat. § 551.604(2).

B. Proposed Orders pursuant to Wis. Stat. § 551.604

- (g) IT IS PROPOSED that an order be issued against JOSHUA STOLL to disgorge all funds received from his conduct in violation of Ch. 551 to the Wisconsin investors described above, less any payments made to the Wisconsin investors pursuant to other regulatory actions, with interest on such amount at the legal rate under Wis. Stat. § 138.04, starting from the effective date of this order through the date of satisfaction, pursuant to Wis. Stat. § 551.604(4m). JOSHUA STOLL shall pay disgorgement within 30 calendar days of the issuance of this order and provide the Division with proof of the disgorgement payments to the Wisconsin investors by no later than 30 days after disgorgement has been paid.
- (h) IT IS FURTHER PROPOSED that an order be issued imposing a civil penalty against JOSHUA STOLL in the form of an administrative assessment totaling \$50,000 for the violations committed against the Wisconsin investors pursuant to Wis. Stat. § 551.604(4) in the event that JOSHUA STOLL does not pay disgorgement and interest in full to the

Wisconsin investors within 30 days of the issuance of this order. Such payment shall be made payable to the Wisconsin Department of Financial Institutions and shall be remitted to the Division no later than 60 calendar days from the date of issuance of this Order.

C. Service of Order

- (i) IT IS FURTHER ORDERED that this Order shall be sent promptly by certified mail to each party named in the Order at his or her last known address or to the party's attorney of record, or shall be personally served upon the party or the party's attorney of record, pursuant to Wis. Admin. Code § DFI-Sec. 8.06. This Order shall also be served upon the office of the administrator pursuant to Wis. Stat. § 551.611.
- (j) PLEASE TAKE NOTICE that if service is by certified mail, the date of the service of this Order is the date it is placed in the mail. If service is by personal service, the date of the service of this Order is the date personal service is completed.

D. Notice of Hearing Rights

- (k) PLEASE TAKE NOTICE that you have the right to request a hearing, pursuant to Wis. Stat. § 551.604(2). Every request for a hearing shall be in the form of a written petition filed with the Division, pursuant to Wis. Admin. Code § DFI-Sec. 8.01 and Wis. Stat. § 227.42. A petition for a hearing to review the order shall:

- (1) Plainly admit or deny each specific allegation, finding or conclusion in the order and incorporated papers. However, if the petitioner lacks sufficient knowledge or information to permit such an admission or denial, the petition shall so state, and that statement shall have the effect of a denial; and
- (2) State all affirmative defenses. Affirmative defenses not raised in the request for hearing may be deemed waived.

- (l) PLEASE TAKE FURTHER NOTICE that you may file your written petition:

- (1) By mailing the written petition to: Division of Securities Wisconsin
Department of Financial Institutions P.O. Box 1768 Madison, Wisconsin
53701-1768;
- (2) By delivering the written petition in person to: Division of Securities
Wisconsin Department of Financial Institutions 4822 Madison Yards Way,
North Tower, 4th Floor Madison, Wisconsin 53705; or
- (3) By faxing the written petition to (608) 264-7979.

- (m) PLEASE TAKE FURTHER NOTICE that the petition for hearing must be filed with the Division. Pursuant to Wis. Stat. § 551.102(8), "filing" means "receipt." Therefore, a petition is not "filed" with the Division until it is actually "received" by the Division. If the Division does not receive your written petition before midnight on the 30th day after the date of service of this order, your right to a hearing will be waived and the Summary Order shall become final by operation of law.
- (n) PLEASE TAKE FURTHER NOTICE that if you do not request a hearing and none is ordered by the Administrator within 30 days after the date of service of this order, the findings of fact, conclusions of law, and summary orders and proposed final orders, including the imposition of a civil penalty and requirement for payment of disgorgement and interest sought in a statement in the order, become final by operation of law, pursuant to Wis. Stat. § 55 I .604(2).
- (o) PLEASE TAKE FURTHER NOTICE that, within 15 days after the Division's receipt of a written request for a hearing from you, the matter will be scheduled for a hearing or other public administrative proceedings, pursuant to Wis. Stats. §§ 55 I .604(2) and (3).

E. Notifications

- (p) PLEASE TAKE FURTHER NOTICE violations of this Order, once final, may be enforced by any investor, or by the Division pursuant to Wis. Stat. § 551.604(7) whether acting in its own right or on behalf of the investor, by petitioning any court of competent jurisdiction to enforce the terms of the order.
- (q) PLEASE TAKE FURTHER NOTICE failure to provide a copy of this Order to prospective investors may be a material misrepresentation in violation of Ch. 551 and this Order.
- (r) PLEASE TAKE FURTHER NOTICE that this Order is effective on the date it is issued. RETIRE HAPPY is advised that any willful violation of an Order issued by the Division under Ch. 551 is a criminal offense punishable under the provisions of Wis. Stat. § 551.508.

Executed at Madison, Wisconsin this 6th day of December's, 2022.



Leslie M. Van Buskirk

Leslie M. Van Buskirk
Administrator
Division of Securities

State of Wisconsin
Department of Financial Institutions
4822 Madison Yards Way
4th Floor North Tower
Madison, Wisconsin 53705

Exhibit 1

Wisconsin Investors

Investor	Address	Issuer	Investment Date	Investment Amount
Albert, Kathleen M.	5811 31st Ave. Kenosha WI 53144	Virtual Communications	9/24/2013	\$ 58,500
		Zeal Wine	10/22/2015	\$ 35,000
		Cryotherm	2/9/2016	\$ 39,000
		Glen Oaks	12/12/2017	\$ 23,000
Amador, Francisco	2925 63rd Street Kenosha WI 53143	Water Street Partners, LLC	4/28/2018	\$ 8,000
Jeampierre, Dennis	1750 Cedar Ridge Dr Slinger WI 53086	Cryotherm	1/4/2016	\$ 120,000
		Monarch Capital Investment	1/4/2016	\$ 18,500
		Until Tomorrow Drivetrains	1/11/2017	\$ 18,500
		2528 N. California, LLC	3/6/2018	\$ 20,000
		Glen Oaks	4/30/2018	\$ 20,000
		Water Street Partners, LLC	5/3/2018	\$ 23,000
Jeampierre, Sharon	1750 Cedar Ridge Dr Slinger WI 53086	Glen Oaks	5/1/2018	\$ 13,500
		Water Street Partners, LLC	5/2/2018	\$ 20,000
Langdon, Latasha	4726A N 30th Street, Milwaukee WI 53209	Golden Genesis, Inc.	9/1/2016	\$ 25,000
		Adomani, Inc.	8/20/2015	\$ 60,000
		Skinvisible, Inc.	8/20/2015	\$ 30,000
		Monarch Capital Investment	8/20/2015	\$ 23,500
Michels-Nelson, Tina	W193 S 7836 Overlook Bay Rd #B, Muskego WI 53150	2528 N. California, LLC	3/6/2018	\$ 90,000

		Dream Team 1416	6/25/2018	\$ 35,000
Osimitz, Don A.	1400 Delta Court, Wausau WI 54401	Monarch Capital Investment	7/20/2016	\$ 9,950
Villwock, David	1331 Bellevue St #516, Green Bay WI 54302	Glen Oaks	5/29/2018	\$ 20,000
Zirbel, Betty	1573 Lindale Ln, Green Bay WI 54313	Monarch Capital Investment	4/27/2017	\$ 160,000
		Monarch Capital Investment	4/27/2017	\$ 8,000
Zirbel, Roderick	6775 Bunker Hill Rd, Greenleaf WI 54126	Until Tomorrow Drivetrains (guaranteed by Adomani, Inc.)	1/19/2017	\$ 40,000
		Glen Oaks	6/28/2018	\$ 13,900
Total Investment Amount				\$ 932,350



State of Wisconsin
Department of Financial Institutions

Tony Evers, **Governor**

Cheryll Olson-Collins, **Secretary**

**AFFIDAVIT OF SERVICE
AND COMPLIANCE WITH WIS. STAT. § 551.611**

STATE OF WISCONSIN)
) ss.
COUNTY OF DANE)

I, KATHERINE CLEMENTI, first being duly sworn, depose and state:

1. I am employed with the State of Wisconsin, Department of Financial Institutions, Division of Securities.
2. On the date of this Affidavit and in the course of regularly conducted activity, I have caused to be served by certified mail upon Joshua Stoll at his last known address of 4618 St Francis St, North Las Vegas, Nevada 89031:
 - i. A copy of the Summary Order to Cease and Desist and Proposed orders for Disgorgement and Civil Penalties, Exhibit 1; DFI Case No. S-243722 (EX); and
 - ii. A copy of this Affidavit of Service.
3. In compliance with Wis. Stat. §§ 227.48, 551.611, and 891.46; and Wis. Admin. Code. §§ DFI-Sec 8.06 and 8.07, I have also caused to be served copies of those same documents upon the Administrator for the Division of Securities.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Katherine Clementi

KATHERINE CLEMENTI

State of Wisconsin
Department of Financial Institutions
Division of Securities

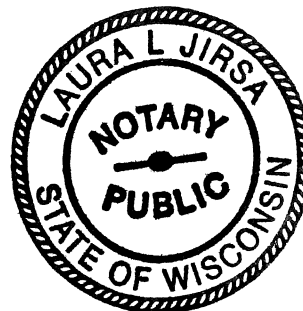
Subscribed and sworn to before me

This 6 day of December, 2022.

Laura L Jirsa

Notary Public, State of Wisconsin
My commission expires 7-1-25.

(Notary Seal)



Division of Securities

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Courier: 4822 Madison Yards Way, Madison, WI 53705
Voice: (608) 261-9555 Fax: (608) 264-7979 Web: www.wdfi.org